



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

October 21, 2022

BY ECF

The Honorable Vernon S. Broderick
United States District Court, Southern District of New York
40 Foley Square
New York, NY 10007

RE: Goldstein v. Hochul, et al., No. 22-cv-8300

Dear Judge Broderick:

This Office represents Defendants Governor of New York State Kathy Hochul and New York Attorney General Letitia James (the “State Defendants”) in the above-captioned action.

We write to request that the current date to answer or otherwise respond to the Complaint be adjourned. The City Defendants and Rockland County Defendants join in this request. We were unable to reach counsel for Plaintiffs in time to obtain their position, as pursuant to Your Honor’s individual rules and practices, this letter must be filed at least 48 hours prior to the original due date, which for the State Defendants is Tuesday, October 25, 2022.

Currently, each of the Defendants’ responses to the Complaint are due between October 25, 2022 and October 28, 2022. As the Court is aware, argument on the Court’s Order to Show Cause relating to Plaintiffs’ motion for a preliminary injunction will be held on October 28, 2022. The outcome of this motion (as well as the outcome of proceedings in similar matters before other District Courts and the Second Circuit) will undoubtedly inform how the Defendants respond to the Complaint. We therefore respectfully request that the Defendants’ responses to the Complaint be adjourned from their current dates to 30 days after the issuance of a decision on the Order to Show Cause.

This is the first request for an adjournment of time to respond to the Complaint.

We appreciate the Court’s attention to this matter.

Respectfully submitted,

/s/ Matthew L. Conrad
Matthew L. Conrad
Assistant Attorney General

Honorable Vernon S. Broderick
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